UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

FEB 16 2010

CERTIFICATION OF VIOLATION CORRECTION

Bob Hueso
Environmental Health and Safety Manager
Neutragena
5760 West 95th Street
Los Angeles, CA 90045
EPA Identification Number: CAR 000 054 031

Dear Mr. Hueso:

On October 22, 2009, a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative of California's Certified Unified Program Agency (CUPA), at Neutragena, located in Los Angeles, California, with EPA Identification Number CAR 000 054 031. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. §6927}.

Pursuant to Section 3008 of RCRA {42 U.S.C. § 6928}, the EPA required you to correct the identified areas of noncompliance and to submit documentation of their correction and to submit additional information to the EPA in response to EPA's Request for Information Letter sent on December 8, 2009.

Neutragena's January 22, 2010 submittal adequately addressed the potential violations which were noted during the inspection, and documents Neutragena's return to compliance with the regulations cited in the inspection report. This letter should not be construed as a determination by the EPA of your compliance with any other applicable regulation.

Neutragena should continue to take the necessary steps to maintain and ensure compliance with all applicable Federal, State and local environmental requirements. If you have questions related to the inspection report or this letter, please contact Cameron McDonald of my staff at (415) 972-3308.

Sincerely,

Amy C. Miller, Manager
RCRA Enforcement Office

cc:

[Charles McLaughlin, Branch Chief
State Regulatory Programs Division
Department of Toxic Substances Control
8800 Cal Center Drive
Sacramento, CA 95826-3200

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

CERTIFIED MAIL NO.
RETURN RECEIPT REQUESTED

Request for Information Pursuant to 3007(a) of the Resource Conservation and Recovery Act

Bob Hueso
Environmental Health and Safety Manager
Neutragena
5760 West 95th Street
Los Angeles, CA 90045
EPA Identification Number: CAR 000 054 031

Dear Mr. Hueso:

On October 22, 2009, a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative of California's Certified Unified Program Agency (CUPA), at Neutragena, located in Los Angeles, California, with EPA Identification Number CAR 000 054 031. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. §6927}.

Under the provisions of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA") {42 U.S.C. § 6927(a)}, the EPA may require persons subject to RCRA to furnish information necessary for the EPA to administer the Act. Pursuant to the EPA's authority set forth in Section 3007(a), you are required to submit the following information to the EPA:

Submit to EPA a waste determination of the waste generated by your facility that is identified as cosmetic liquid waste and precursor liquids. Conduct the waste determination according to the procedures defined in 40 C.F.R § 265.1084, Waste Determination procedures. EPA is interested in the average volatile organic (VO) concentration of the cosmetic liquid waste and precursor liquids at the point of generation.

Section 3008 of RCRA {42 U.S.C. § 6928}, authorizes the initiation of a civil enforcement proceeding for failure to respond fully to the information request set out in this letter. Section 3008 also authorizes criminal prosecution for knowingly making a false statement or omitting material information.

EPA regulations governing confidentiality of business information are set forth in 40 C.F.R. Part 2, Subpart B. For any portion of the information submitted which is entitled to confidential

treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within [DAYS, TYPICALLY 14] calendar days from the date of your receipt of this letter as a waiver of that claim, and information may be made available to the public by the EPA without further notice.

This request for information is not subject to review by the Office of Management and Budget ("OMB") under the Paperwork Reduction Act because it is not an "information collection request" within the meaning of 44 U.S.C. §§ 3502(3), 3507, 3512, and 3518(c)(1) {5 C.F.R. §§ 1320.3(c), 1320.4, and 1320.6(a)}. Furthermore, it is exempt from OMB review under the Paperwork Reduction Act because it is directed to fewer than ten persons {44 U.S.C. § 3502(4), (11); 5 C.F.R. §§ 1320.4 and 1320.6(a)}.

Your response to this request must be made by letter, signed by a duly authorized official, and submitted to the EPA within twenty-on [21] calendar days from the date of your receipt of this letter. Please address the submittal to:

Cameron McDonald
Mail code: WST-3
RCRA Enforcement Office
U.S. Environmental Protection Agency
75 Hawthorne Street
San Francisco, CA 94105

You may have been provided during the inspection with a Small Business Regulatory Enforcement and Fairness Act (SBREFA) Information Sheet. If not, please see http://www.epa.gov/compliance/resources/publications/incentives/smallbusiness/smallbusresources.pdf. The Information Sheet is designed to provide information on compliance assistance and inform small businesses of their rights to comment to the SBREFA Ombudsman concerning EPA enforcement activities. Be aware that SBREFA does not eliminate your responsibilities to respond to this letter within the allowed time nor does it create any new rights or defenses under the law.

If you have questions related this letter, please contact Cameron McDonald of my staff at (415) 972-3308. Your cooperation in this matter is appreciated.

Sincerely,

Amy C. Miller, Manager
RCRA Enforcement Office

Neutrogena
CORPORATION

5760 West 96th Street
Los Angeles, CA 90045
310.642.1150

January 22, 2010

Amy C. Miller
Mail code: WST-3
RCRA Enforcement Office
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Miller,

In response to the information you requested on December 8, 2009, Neutrogena has conducted waste determination sampling on January 14, 2010, according to the procedures defined in 40 CFR 265.1084, waste determination procedures.

The goal of the sampling was to determine average volatile organic (VO) concentration of Cosmetic Rinse Water and Cosmetic Precursor Liquids. Using EPA method 8260B, the average VO concentration is:

Cosmetic Rinse Water – 15.31 ppm
Cosmetic Precursor Liquids – 1.012 ppm

Both wastes contain VOC in concentration less than 500 ppm.

I. Sampling Protocol

Prior to sampling, a waste determination sampling protocol (Appendix A) was created according to the procedures defined in 40 CFR 265.1084. Waste determination sampling was conducted in the manner described in this sampling protocol.

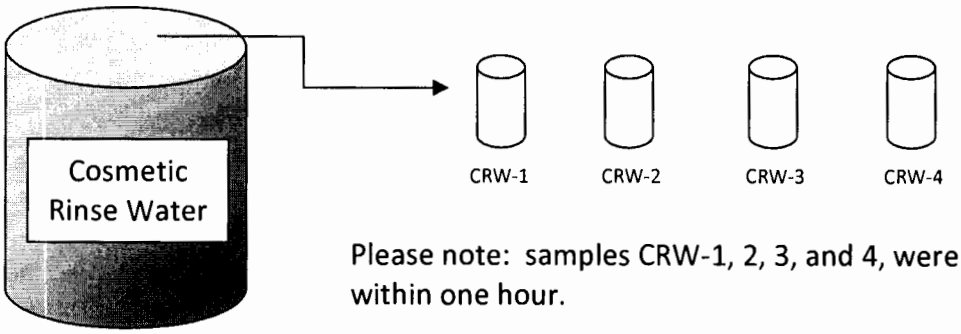
II. Sampling Summary

There were two waste profiles of concern: Cosmetic Rinse Water (CRW), and Cosmetic Precursor Liquid (CPL). Four discrete samples for each of the waste profiles were collected. These samples were

designated with sample identifications: CRW-1, CRW-2, CRW-3, and CRW-4 (shown in Figure 1), as well as CPL-1, CPL-2, CPL-3, and CPL-4 (shown in Figure 2).

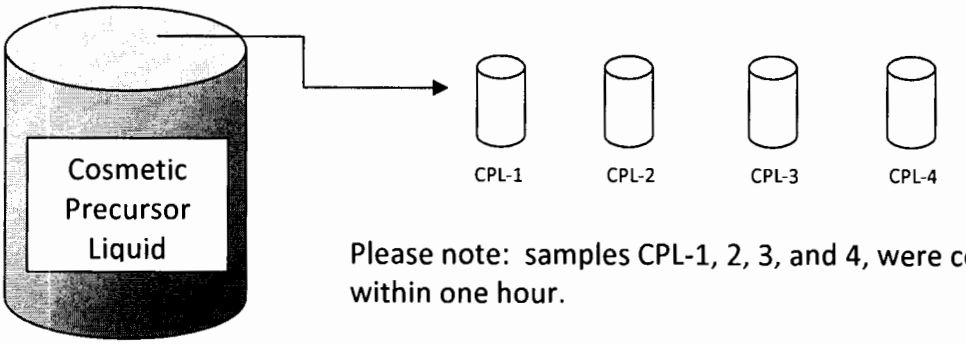
Each discrete sample collected (i.e. CRW-1) was filled using 3 x 40 ml vials, and all three vials were labeled with the same sample ID, as required. Each sample was filled to according to the sampling protocol in Appendix A. After filling, the sample vial was capped, correctly labeled, placed in a new zip block bag, and then immediately placed on ice packs in a cooler.

Sample ID, lab ID, date and time of collection, container number and size, were recorded using the Chain of Custody Record (Appendix B). The samples were sent to a certified lab for analysis.



Please note: samples CRW-1, 2, 3, and 4, were collected within one hour.

Figure 1



Please note: samples CPL-1, 2, 3, and 4, were collected within one hour.

Figure 2

III. Analytical Results

The samples were analyzed using EPA method 8260B, by a certified analytical lab. Appendix C contains the original analytical report.

As shown in the full analytical report, majority of the analytes were not detected. Tables 1 and 2 provide the summarized data for analytical results above detection limits.

Table 1:
Cosmetic Rinse Water
Total volume represented by sampling – 2,900 gallons (about 11,220 Liters)

Sample ID	CRW-1	CRW-2	CRW-3	CRW-4	Average of CRW-1 to CRW-4 (µg/L)
Analyte	Result (µg/L)	Result (µg/L)	Result (µg/L)	Result (µg/L)	
Isopropylbenzene	ND	54.0	ND	55.0	27.3
Naphthalene	15,500	15,000	15,000	15,500	15,250
n-Propylbenzene	ND	61.0	ND	53.0	28.5
Total VOC (µg/L)	15,500	15,115	15,000	15,608	15,306

Table 2:
Cosmetic Precursor Liquid
Total volume represented by sampling – 8 gallons (about 31 Liters)

Sample ID	CPL-1	CPL-2	CPL-3	CPL-4	Average of CPL-1 to CPL-4 (µg/L)
Analyte	Result (µg/L)	Result (µg/L)	Result (µg/L)	Result (µg/L)	
Chloroform	159	328	ND	ND	121.8
Isopropylbenzene	63	166	116	203	137
Naphthalene	1,630	370	265	441	676.5
n-Propylbenzene	ND	110	75	124	77.3
Total VOC (µg/L)	1,852	974	456	768	1,012.5

IV. Calculation

Using the density of water and specific gravity of 1, VOC concentration of liquid waste is converted as:
1 µg/L = 1 parts per billion (ppb) by weight = 0.001 parts per million (ppm) by weight

Tables 3 and 4 provide the VOC results in ppm

Table 3:
Cosmetic Rinse Water VOC concentration in ppm

Sample ID	CRW-1	CRW-2	CRW-3	CRW-4	Average of CRW-1 to CRW-4 (ppm)
Analyte	Result (ppm)	Result (ppm)	Result (ppm)	Result (ppm)	
Isopropylbenzene	ND	0.054	ND	0.055	0.027
Naphthalene	15.50	15.00	15.00	15.50	15.25
n-Propylbenzene	ND	0.061	ND	0.053	0.028
Total VOC (ppm)	15.50	15.12	15.00	15.61	**15.31**

Table 4:
Cosmetic Precursor Liquid VOC concentration in ppm

Sample ID	CPL-1	CPL-2	CPL-3	CPL-4	Average of CPL-1 to CPL-4 (ppm)
Analyte	Result (ppm)	Result (ppm)	Result (ppm)	Result (ppm)	
Chloroform	0.159	0.328	ND	ND	0.121
Isopropylbenzene	0.063	0.166	0.116	0.203	0.137
Naphthalene	1.630	0.370	0.265	0.441	0.676
n-Propylbenzene	ND	0.110	0.075	0.124	0.077
Total VOC (ppm)	1.852	0.974	0.456	0.768	**1.012**

V. Conclusion

Neutrogena conducted the waste determination sampling according to the procedures defined in 40 CFR 265.1084, waste determination procedures. The goal of the sampling was to determine average volatile organic (VO) concentration of Cosmetic Rinse Water and Cosmetic Precursor Liquids. Using EPA method 8260B, the average VO concentration is:

Cosmetic Rinse Water – 15.31 ppm
Cosmetic Precursor Liquids – 1.012 ppm

Both wastes contain VOC in concentration less than 500 ppm.

If you have any questions, please contact me at (310) 216 – 2465 or via email at rhueso@its.jnj.com

Sincerely,

Bob Hueso
Environmental Health and Safety Manager
Neutrogena

CC. Cameron McDonald, RCRA Enforcement Officer

Appendix A
Waste Determination Sampling Protocol

This is the procedure for collecting samples for the wastes determination analysis, on January 14, 2010. This sampling protocol is written to ensure compliance with 40 CFR 265.1084, Waste Determination Procedure.

Preparation

Before sampling, make sure the following supplies are available.

1) a box of nitrile gloves to use for sample collection. The gloves are to be changed after each discrete sample collected
2) a cooler or other container which can be used to contain and transport the samples to the laboratory
3) new plastic ziplock bags as additional protection from contamination for the samples in transport
4) ice or "blue ice" for proper temperature storage. The samples for Volatile Organic Compounds (VOC's) must be placed on ice as soon as possible after collection to prevent VOC loss from the samples. They are to be maintained in the cooler until they can be transferred to the laboratory
5) VOC containers (Volatile Organic Analysis – VOA) with labels –fill out customer information (Neutrogena) and requested analysis (EPA 8260B) in advance to streamline the collection process. The sample ID may be pre-filled provided the vials are used in order
6) Chain of custody, completed with sample ID's, customer information, and requested analysis (EPA 8260B)-only the sample date and times should be blank prior to the sampling event

Sampling

2 sets of samples are to be collected

1) Cosmetic Rinse Water (sample IDs: CRW-1,CRW-2,CRW-3,CRW-4)
2) Cosmetic Precursor Liquids (sample IDs: CPL-1, CPL-2,CPL-3,CPL-4)

Please be aware that the samples for an individual stream MUST be collected within one hour time frame.

1) CRW-1 to CRW-4 collection time logged must be spaced apart by no more than 1 hour
2) CPL-1 to CPL-4 collection time logged must be spaced apart by no more than 1 hour

The amount of waste material represented by the samples should be documented.

Individual sample procedure:

1) Change gloves
2) Collect liquid sample at point of generation-fill VOA bottle with liquid so that it is on the verge of overflowing, the liquid should "bulge" over the top. Tap the VOA if necessary to remove bubbles

3) Cap the VOA, checking to make sure no bubbles are present in the VOA, if bubbles are present , resample using the same VOA until it is bubble-free
4) Log the date and time of the successful sample and sample ID on the VOA label after a successful sample collection
5) Copy the date, time, and Sample ID (CRW-1) to the chain of custody
6) Place in a zip-lock bag for protection
7) Place on ice in the cooler. Use additional bags for protection as necessary to prevent water from cooler getting into sample bags
8) Perform steps 1-7 for samples 2,3, and 4 of the first waste type, remaining samples (CRW-2, CRW-3,CRW-4)
9) Perform steps 1 -7 for the second waste type (Cosmetic Precursor Liquid CPL-1, CPL-2.CPL-3,CPL-4)

Log the amount of waste represented by waste flow of waste at collection point during the sampling time (not to exceed 1 hour)

Post sampling

1) Verify all VOA's are properly labeled and logged on the chain of custody with the date, time of collection, and sample ID numbers
2) Verify all containers are properly stabilized inside the cooler and in contact with the ice or blue ice
3) Transport to laboratory for analysis with chain of custody

Appendix B

Chain of Custody Record

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

CHAIN OF CUSTODY RECORD

№ 65568

AETL JOB No. 55558

Page 1 of 1

COMPANY	NEUROGENX CORP
PROJECT MANAGER	RAFAEL BUSTOS
COMPANY ADDRESS	5960 W 96TH ST. LA, CA 90045
PHONE	310-410-5554
FAX	310-337-5541
PROJECT NAME	PROJECT EPA
PROJECT #	
SITE NAME AND ADDRESS	5955 W. 96TH ST. LA, CA 90045
PO #	

	SAMPLE ID	LAB ID	DATE	TIME	MATRIX	CONTAINER NUMBER/SIZE	PRES.	EPA 8260B	TEST INSTRUCTIONS & COMMENTS
1	CEN-1	55558-01	01-14-10	1:05pm		3x40mL	N/A	X	
2	CEN-2	55558-02	01-14-10	1:14pm		"	"	X	
3	CEN-3	55558-03	01-14-10	1:19pm		"	"	X	
4	CEN-4	55558-04	01-14-10	1:25pm		3x40mL	N/A	X	
5									
6	CPL-1	55558-05	01-14-10	11:35am		3x40mL	N/A	X	
7	CPL-2	55558-06	01-14-10	11:52am		"		X	
8	CPL-3	55558-07	01-14-10	12:05pm		"		X	
9	CPL-4	55558-08	01-14-10	12:22pm		3x40mL	N/A	X	

SAMPLE RECEIPT - TO BE FILLED BY LABORATORY

TOTAL NUMBER OF CONTAINERS	27	PROPERLY COOLED (Y) N / NA	
CUSTODY SEALS Y / N / (NA)		SAMPLES INTACT (Y) N / NA	
RECEIVED IN GOOD COND. (Y) N		SAMPLES ACCEPTED (Y) N	

TURN AROUND TIME

☐ NORMAL ☒ RUSH ☐ SAME DAY ☒ NEXT DAY ☐ 2 DAYS ☐ 3 DAYS

	1.	2.	3.
RELINQUISHED BY SAMPLER:	MARK NAVRATIL		
Signature:			
Printed Name:	MARK NAVRATIL	GARY NUNEZ	
Date:	01-14-10	1/14-10	1/14-10
Time:	1537	1445	1615
RECEIVED BY:			AETL
Signature:			
Printed Name:	RAFAEL BUSTOS		
Date:	01-14-10	1/14-10	01/14/10
Time:	1:37PM	1445	1615

DISTRIBUTION: WHITE - Laboratory, CANARY - Laboratory, PINK - Project/Account Manager, YELLOW - Sampler/Originator

Appendix C

Analytical Results

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street, Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

Ordered By

Neutrogena Corporation
5760 W. 96th Street
Los Angeles, CA 90045-5544

Telephone: (310) 642-1150
Attention: Rafael Bustos

Number of Pages	**11**
Date Received	**01/14/2010**
Date Reported	**01/15/2010**

Job Number	Order Date	Client
55558	01/14/2010	NEUTRO

Project ID: PROJECT EPA
Site: 5755 W. 96th Street
Los Angeles, CA 90045-5544

Enclosed please find results of analyses of 8 liquid waste samples which were analyzed as specified on the attached chain of custody. If there are any questions, please do not hesitate to call.

Checked By: _____ Approved By: _____

Cyrus Razmara, Ph.D.
Laboratory Director

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Neutrogena Corporation
5760 W. 96th Street
Los Angeles, CA 90045-5544

Telephone: (310)642-1150
Attn: Rafael Bustos
Page: 2
Project ID: PROJECT EPA

Site

5755 W. 96th Street
Los Angeles, CA 90045-5544

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			Method Blank				
Client Sample I.D.							
Date Sampled							
Date Prepared			01/15/2010				
Preparation Method			5030B				
Date Analyzed			01/15/2010				
Matrix			Liquid Waste				
Units			ug/L				
Dilution Factor			1				
Analytes	**MDL**	**PQL**	**Results**				
Acetone	10	10	ND				
Acrolein	0.5	1.0	ND				
Benzene	0.5	1.0	ND				
Bromobenzene (Phenyl bromide)	0.5	1.0	ND				
Bromochloromethane	0.5	1.0	ND				
Bromodichloromethane	0.5	1.0	ND				
Bromoform (Tribromomethane)	2.5	5.0	ND				
Bromomethane (Methyl bromide)	1.5	3.0	ND				
2-Butanone (MEK)	5.0	5.0	ND				
n-Butylbenzene	0.5	1.0	ND				
sec-Butylbenzene	0.5	1.0	ND				
tert-Butylbenzene	0.5	1.0	ND				
Carbon Disulfide	0.5	1.0	ND				
Carbon tetrachloride	0.5	1.0	ND				
Chlorobenzene	0.5	1.0	ND				
Chloroethane	1.5	3.0	ND				
2-Chloroethyl vinyl ether	2.5	5.0	ND				
Chloroform (Trichloromethane)	0.5	1.0	ND				
Chloromethane (Methyl chloride)	1.5	3.0	ND				
2-Chlorotoluene	0.5	1.0	ND				
4-Chlorotoluene	0.5	1.0	ND				
1,2-Dibromo-3-chloropropane (DBCP)	2.5	5.0	ND				
Dibromochloromethane	0.5	1.0	ND				
1,2-Dibromoethane (EDB)	0.5	1.0	ND				
Dibromomethane	0.5	1.0	ND				
1,2-Dichlorobenzene	0.5	1.0	ND				
1,3-Dichlorobenzene	0.5	1.0	ND				
1,4-Dichlorobenzene	0.5	1.0	ND				

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Project ID: PROJECT EPA

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			Method Blank				
Client Sample I.D.							
Date Sampled							
Date Prepared			01/15/2010				
Preparation Method			5030B				
Date Analyzed			01/15/2010				
Matrix			Liquid Waste				
Units			ug/L				
Dilution Factor			1				
Analytes	**MDL**	**PQL**	**Results**				
Dichlorodifluoromethane	1.5	3.0	ND				
1,1-Dichloroethane	0.5	1.0	ND				
1,2-Dichloroethane (EDC)	0.5	1.0	ND				
1,1-Dichloroethene	0.5	1.0	ND				
cis-1,2-Dichloroethene	0.5	1.0	ND				
trans-1,2-Dichloroethene	0.5	1.0	ND				
1,2-Dichloropropane	0.5	1.0	ND				
1,3-Dichloropropane	0.5	1.0	ND				
2,2-Dichloropropane	0.5	1.0	ND				
1,1-Dichloropropene	0.5	1.0	ND				
cis-1,3-Dichloropropene	0.5	1.0	ND				
trans-1,3-Dichloropropene	0.5	1.0	ND				
Ethylbenzene	0.5	1.0	ND				
Hexachlorobutadiene	1.5	3.0	ND				
2-Hexanone	2.5	5.0	ND				
Iodomethane	0.5	1.0	ND				
Isopropylbenzene	0.5	1.0	ND				
p-Isopropyltoluene	0.5	1.0	ND				
4-Methyl-2-pentanone (MIBK)	2.5	5.0	ND				
Methyl-tert-butyl ether (MTBE)	0.5	1.0	ND				
Methylene chloride (DCM)	2.0	4.0	ND				
Naphthalene	0.5	1.0	ND				
n-Propylbenzene	0.5	1.0	ND				
Styrene	0.5	1.0	ND				
1,1,1,2-Tetrachloroethane	0.5	1.0	ND				
1,1,2,2-Tetrachloroethane	0.5	1.0	ND				
Tetrachloroethene	0.5	1.0	ND				
Toluene (Methyl benzene)	0.5	1.0	ND				
1,2,3-Trichlorobenzene	0.5	1.0	ND				
1,2,4-Trichlorobenzene	0.5	1.0	ND				
1,1,1-Trichloroethane	0.5	1.0	ND				
1,1,2-Trichloroethane	0.5	1.0	ND				
Trichloroethene	0.5	1.0	ND				
Trichlorofluoromethane	0.5	1.0	ND				

American Environmental Testing Laboratory Inc.
2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Project ID: PROJECT EPA

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			Method Blank				
Client Sample I.D.							
Date Sampled							
Date Prepared			01/15/2010				
Preparation Method			5030B				
Date Analyzed			01/15/2010				
Matrix			Liquid Waste				
Units			ug/L				
Dilution Factor			1				
Analytes	**MDL**	**PQL**	**Results**				
1,2,3-Trichloropropane	0.5	1.0	ND				
1,2,4-Trimethylbenzene	0.5	1.0	ND				
1,3,5-Trimethylbenzene	0.5	1.0	ND				
Vinyl Acetate	0.5	5.0	ND				
Vinyl chloride (Chloroethene)	0.5	3.0	ND				
o-Xylene	0.5	1.0	ND				
m,p-Xylenes	1.0	2.0	ND				
Our Lab I.D.			Method Blank				
Surrogates	**%Rec.Limit**		**% Rec.**				
Bromofluorobenzene	75-125		105				
Dibromofluoromethane	75-125		102				
Toluene-d8	75-125		97.3				

American Environmental Testing Laboratory Inc.

2834 & 2908 North Naomi Street Burbank, CA 91504 • DOHS NO: 1541, LACSD NO: 10181
Tel: (888) 288-AETL • (818) 845-8200 • Fax: (818) 845-8840 • www.aetlab.com

ANALYTICAL RESULTS

Ordered By

Neutrogena Corporation
5760 W. 96th Street
Los Angeles, CA 90045-5544

Telephone: (310)642-1150
Attn: Rafael Bustos
Page: 5
Project ID: PROJECT EPA

Site

5755 W. 96th Street
Los Angeles, CA 90045-5544

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			55558.01	55558.02	55558.03	55558.04	55558.05
Client Sample I.D.			CRW-1	CRW-2	CRW-3	CRW-4	CPL-1
Date Sampled			01/14/2010	01/14/2010	01/14/2010	01/14/2010	01/14/2010
Date Prepared			01/15/2010	01/15/2010	01/15/2010	01/15/2010	01/15/2010
Preparation Method			5030B	5030B	5030B	5030B	5030B
Date Analyzed			01/15/2010	01/15/2010	01/15/2010	01/15/2010	01/15/2010
Matrix			Liquid Waste	Liquid Waste	Liquid Waste	Liquid Waste	Liquid Waste
Units			ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor			100	100	100	100	100
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**	**Results**	**Results**
Acetone	1000	1000	ND	ND	ND	ND	ND
Acrolein	50	100	ND	ND	ND	ND	ND
Benzene	50	100	ND	ND	ND	ND	ND
Bromobenzene (Phenyl bromide)	50	100	ND	ND	ND	ND	ND
Bromochloromethane	50	100	ND	ND	ND	ND	ND
Bromodichloromethane	50	100	ND	ND	ND	ND	ND
Bromoform (Tribromomethane)	250	500	ND	ND	ND	ND	ND
Bromomethane (Methyl bromide)	150	300	ND	ND	ND	ND	ND
2-Butanone (MEK)	500	500	ND	ND	ND	ND	ND
n-Butylbenzene	50	100	ND	ND	ND	ND	ND
sec-Butylbenzene	50	100	ND	ND	ND	ND	ND
tert-Butylbenzene	50	100	ND	ND	ND	ND	ND
Carbon Disulfide	50	100	ND	ND	ND	ND	ND
Carbon tetrachloride	50	100	ND	ND	ND	ND	ND
Chlorobenzene	50	100	ND	ND	ND	ND	ND
Chloroethane	150	300	ND	ND	ND	ND	ND
2-Chloroethyl vinyl ether	250	500	ND	ND	ND	ND	ND
Chloroform (Trichloromethane)	50	100	ND	ND	ND	ND	159
Chloromethane (Methyl chloride)	150	300	ND	ND	ND	ND	ND
2-Chlorotoluene	50	100	ND	ND	ND	ND	ND
4-Chlorotoluene	50	100	ND	ND	ND	ND	ND
1,2-Dibromo-3-chloropropane (DBCP)	250	500	ND	ND	ND	ND	ND
Dibromochloromethane	50	100	ND	ND	ND	ND	ND
1,2-Dibromoethane (EDB)	50	100	ND	ND	ND	ND	ND
Dibromomethane	50	100	ND	ND	ND	ND	ND
1,2-Dichlorobenzene	50	100	ND	ND	ND	ND	ND
1,3-Dichlorobenzene	50	100	ND	ND	ND	ND	ND
1,4-Dichlorobenzene	50	100	ND	ND	ND	ND	ND

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ANALYTICAL RESULTS

Project ID: PROJECT EPA

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			**55558.01**	**55558.02**	**55558.03**	**55558.04**	**55558.05**
Client Sample I.D.			CRW-1	CRW-2	CRW-3	CRW-4	CPL-1
Date Sampled			01/14/2010	01/14/2010	01/14/2010	01/14/2010	01/14/2010
Date Prepared			01/15/2010	01/15/2010	01/15/2010	01/15/2010	01/15/2010
Preparation Method			5030B	5030B	5030B	5030B	5030B
Date Analyzed			01/15/2010	01/15/2010	01/15/2010	01/15/2010	01/15/2010
Matrix			Liquid Waste	Liquid Waste	Liquid Waste	Liquid Waste	Liquid Waste
Units			ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor			100	100	100	100	100
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**	**Results**	**Results**
Dichlorodifluoromethane	150	300	ND	ND	ND	ND	ND
1,1-Dichlorocthane	50	100	ND	ND	ND	ND	ND
1,2-Dichloroethane (EDC)	50	100	ND	ND	ND	ND	ND
1,1-Dichloroethene	50	100	ND	ND	ND	ND	ND
cis-1,2-Dichloroethene	50	100	ND	ND	ND	ND	ND
trans-1,2-Dichloroethene	50	100	ND	ND	ND	ND	ND
1,2-Dichloropropane	50	100	ND	ND	ND	ND	ND
1,3-Dichloropropane	50	100	ND	ND	ND	ND	ND
2,2-Dichloropropane	50	100	ND	ND	ND	ND	ND
1,1-Dichloropropene	50	100	ND	ND	ND	ND	ND
cis-1,3-Dichloropropene	50	100	ND	ND	ND	ND	ND
trans-1,3-Dichloropropene	50	100	ND	ND	ND	ND	ND
Ethylbenzene	50	100	ND	ND	ND	ND	ND
Hexachlorobutadiene	150	300	ND	ND	ND	ND	ND
2-Hexanone	250	500	ND	ND	ND	ND	ND
Iodomethane	50	100	ND	ND	ND	ND	ND
Isopropylbenzene	50	100	ND	54.0J	ND	55.0J	63.0J
p-Isopropyltoluene	50	100	ND	ND	ND	ND	ND
4-Methyl-2-pentanone (MIBK)	250	500	ND	ND	ND	ND	ND
Methyl-tert-butyl ether (MTBE)	50	100	ND	ND	ND	ND	ND
Methylene chloride (DCM)	200	400	ND	ND	ND	ND	ND
Naphthalene	50	100	15,500	15,000	15,000	15,500	1,630
n-Propylbenzene	50	100	ND	61.0J	ND	53.0J	ND
Styrene	50	100	ND	ND	ND	ND	ND
1,1,1,2-Tetrachloroethane	50	100	ND	ND	ND	ND	ND
1,1,2,2-Tetrachloroethane	50	100	ND	ND	ND	ND	ND
Tetrachloroethene	50	100	ND	ND	ND	ND	ND
Toluene (Methyl benzene)	50	100	ND	ND	ND	ND	ND
1,2,3-Trichlorobenzene	50	100	ND	ND	ND	ND	ND
1,2,4-Trichlorobenzene	50	100	ND	ND	ND	ND	ND
1,1,1-Trichloroethane	50	100	ND	ND	ND	ND	ND
1,1,2-Trichloroethane	50	100	ND	ND	ND	ND	ND
Trichloroethene	50	100	ND	ND	ND	ND	ND
Trichlorofluoromethane	50	100	ND	ND	ND	ND	ND

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ANALYTICAL RESULTS

Project ID: PROJECT EPA

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			**55558.01**	**55558.02**	**55558.03**	**55558.04**	**55558.05**
Client Sample I.D.			CRW-1	CRW-2	CRW-3	CRW-4	CPL-1
Date Sampled			01/14/2010	01/14/2010	01/14/2010	01/14/2010	01/14/2010
Date Prepared			01/15/2010	01/15/2010	01/15/2010	01/15/2010	01/15/2010
Preparation Method			5030B	5030B	5030B	5030B	5030B
Date Analyzed			01/15/2010	01/15/2010	01/15/2010	01/15/2010	01/15/2010
Matrix			Liquid Waste	Liquid Waste	Liquid Waste	Liquid Waste	Liquid Waste
Units			ug/L	ug/L	ug/L	ug/L	ug/L
Dilution Factor			100	100	100	100	100
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**	**Results**	**Results**
1,2,3-Trichloropropane	50	100	ND	ND	ND	ND	ND
1,2,4-Trimethylbenzene	50	100	ND	ND	ND	ND	ND
1,3,5-Trimethylbenzene	50	100	ND	ND	ND	ND	ND
Vinyl Acetate	50	500	ND	ND	ND	ND	ND
Vinyl chloride (Chloroethene)	50	300	ND	ND	ND	ND	ND
o-Xylene	50	100	ND	ND	ND	ND	ND
m,p-Xylenes	100	200	ND	ND	ND	ND	ND
Our Lab I.D.			**55558.01**	**55558.02**	**55558.03**	**55558.04**	**55558.05**
Surrogates	**%Rec.Limit**		**% Rec.**	**% Rec.**	**% Rec.**	**% Rec.**	**% Rec.**
Bromofluorobenzene	75-125		96.0	107	99.5	111	104
Dibromofluoromethane	75-125		102	99.9	108	109	107
Toluene-d8	75-125		98.5	97.6	97.3	99.2	97.9

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ANALYTICAL RESULTS

Ordered By

Neutrogena Corporation
5760 W. 96th Street
Los Angeles, CA 90045-5544

Telephone: (310)642-1150
Attn: Rafael Bustos
Page: 8
Project ID: PROJECT EPA

Site

5755 W. 96th Street
Los Angeles, CA 90045-5544

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			55558.06	55558.07	55558.08		
Client Sample I.D.			CPL-2	CPL-3	CPL-4		
Date Sampled			01/14/2010	01/14/2010	01/14/2010		
Date Prepared			01/15/2010	01/15/2010	01/15/2010		
Preparation Method			5030B	5030B	5030B		
Date Analyzed			01/15/2010	01/15/2010	01/15/2010		
Matrix			Liquid Waste	Liquid Waste	Liquid Waste		
Units			ug/L	ug/L	ug/L		
Dilution Factor			100	100	100		
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**		
Acetone	1000	1000	ND	ND	ND		
Acrolein	50	100	ND	ND	ND		
Benzene	50	100	ND	ND	ND		
Bromobenzene (Phenyl bromide)	50	100	ND	ND	ND		
Bromochloromethane	50	100	ND	ND	ND		
Bromodichloromethane	50	100	ND	ND	ND		
Bromoform (Tribromomethane)	250	500	ND	ND	ND		
Bromomethane (Methyl bromide)	150	300	ND	ND	ND		
2-Butanone (MEK)	500	500	ND	ND	ND		
n-Butylbenzene	50	100	ND	ND	ND		
sec-Butylbenzene	50	100	ND	ND	ND		
tert-Butylbenzene	50	100	ND	ND	ND		
Carbon Disulfide	50	100	ND	ND	ND		
Carbon tetrachloride	50	100	ND	ND	ND		
Chlorobenzene	50	100	ND	ND	ND		
Chloroethane	150	300	ND	ND	ND		
2-Chloroethyl vinyl ether	250	500	ND	ND	ND		
Chloroform (Trichloromethane)	50	100	328	ND	ND		
Chloromethane (Methyl chloride)	150	300	ND	ND	ND		
2-Chlorotoluene	50	100	ND	ND	ND		
4-Chlorotoluene	50	100	ND	ND	ND		
1,2-Dibromo-3-chloropropane (DBCP)	250	500	ND	ND	ND		
Dibromochloromethane	50	100	ND	ND	ND		
1,2-Dibromoethane (EDB)	50	100	ND	ND	ND		
Dibromomethane	50	100	ND	ND	ND		
1,2-Dichlorobenzene	50	100	ND	ND	ND		
1,3-Dichlorobenzene	50	100	ND	ND	ND		
1,4-Dichlorobenzene	50	100	ND	ND	ND		

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ANALYTICAL RESULTS

Project ID: PROJECT EPA

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			**55558.06**	**55558.07**	**55558.08**		
Client Sample I.D.			CPL-2	CPL-3	CPL-4		
Date Sampled			01/14/2010	01/14/2010	01/14/2010		
Date Prepared			01/15/2010	01/15/2010	01/15/2010		
Preparation Method			5030B	5030B	5030B		
Date Analyzed			01/15/2010	01/15/2010	01/15/2010		
Matrix			Liquid Waste	Liquid Waste	Liquid Waste		
Units			ug/L	ug/L	ug/L		
Dilution Factor			100	100	100		
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**		
Dichlorodifluoromethane	150	300	ND	ND	ND		
1,1-Dichloroethane	50	100	ND	ND	ND		
1,2-Dichloroethane (EDC)	50	100	ND	ND	ND		
1,1-Dichloroethene	50	100	ND	ND	ND		
cis-1,2-Dichloroethene	50	100	ND	ND	ND		
trans-1,2-Dichloroethene	50	100	ND	ND	ND		
1,2-Dichloropropane	50	100	ND	ND	ND		
1,3-Dichloropropane	50	100	ND	ND	ND		
2,2-Dichloropropane	50	100	ND	ND	ND		
1,1-Dichloropropene	50	100	ND	ND	ND		
cis-1,3-Dichloropropene	50	100	ND	ND	ND		
trans-1,3-Dichloropropene	50	100	ND	ND	ND		
Ethylbenzene	50	100	ND	ND	ND		
Hexachlorobutadiene	150	300	ND	ND	ND		
2-Hexanone	250	500	ND	ND	ND		
Iodomethane	50	100	ND	ND	ND		
Isopropylbenzene	50	100	166	116	203		
p-Isopropyltoluene	50	100	ND	ND	ND		
4-Methyl-2-pentanone (MIBK)	250	500	ND	ND	ND		
Methyl-tert-butyl ether (MTBE)	50	100	ND	ND	ND		
Methylene chloride (DCM)	200	400	ND	ND	ND		
Naphthalene	50	100	370	265	441		
n-Propylbenzene	50	100	110	75.0J	124		
Styrene	50	100	ND	ND	ND		
1,1,1,2-Tetrachloroethane	50	100	ND	ND	ND		
1,1,2,2-Tetrachloroethane	50	100	ND	ND	ND		
Tetrachloroethene	50	100	ND	ND	ND		
Toluene (Methyl benzene)	50	100	ND	ND	ND		
1,2,3-Trichlorobenzene	50	100	ND	ND	ND		
1,2,4-Trichlorobenzene	50	100	ND	ND	ND		
1,1,1-Trichloroethane	50	100	ND	ND	ND		
1,1,2-Trichloroethane	50	100	ND	ND	ND		
Trichloroethene	50	100	ND	ND	ND		
Trichlorofluoromethane	50	100	ND	ND	ND		

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ANALYTICAL RESULTS

Project ID: PROJECT EPA

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 011510

Our Lab I.D.			**55558.06**	**55558.07**	**55558.08**		
Client Sample I.D.			CPL-2	CPL-3	CPL-4		
Date Sampled			01/14/2010	01/14/2010	01/14/2010		
Date Prepared			01/15/2010	01/15/2010	01/15/2010		
Preparation Method			5030B	5030B	5030B		
Date Analyzed			01/15/2010	01/15/2010	01/15/2010		
Matrix			Liquid Waste	Liquid Waste	Liquid Waste		
Units			ug/L	ug/L	ug/L		
Dilution Factor			100	100	100		
Analytes	**MDL**	**PQL**	**Results**	**Results**	**Results**		
1,2,3-Trichloropropane	50	100	ND	ND	ND		
1,2,4-Trimethylbenzene	50	100	ND	ND	ND		
1,3,5-Trimethylbenzene	50	100	ND	ND	ND		
Vinyl Acetate	50	500	ND	ND	ND		
Vinyl chloride (Chloroethene)	50	300	ND	ND	ND		
o-Xylene	50	100	ND	ND	ND		
m,p-Xylenes	100	200	ND	ND	ND		
Our Lab I.D.			**55558.06**	**55558.07**	**55558.08**		
Surrogates	**%Rec.Limit**		**% Rec.**	**% Rec.**	**% Rec.**		
Bromofluorobenzene	75-125		118	118	119		
Dibromofluoromethane	75-125		105	105	103		
Toluene-d8	75-125		98.5	101	101		

American Environmental Testing Laboratory Inc.

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QUALITY CONTROL RESULTS

Ordered By

Neutrogena Corporation
5760 W. 96th Street
Los Angeles, CA 90045-5544

Telephone: (310)642-1150
Attn: Rafael Bustos
Page: 11
Project ID: PROJECT EPA

Site

5755 W. 96th Street
Los Angeles, CA 90045-5544

AETL Job Number	Submitted	Client
55558	01/14/2010	NEUTRO

Method: 8260B, Volatile Organic Compounds by GC/MS (SW846)

QC Batch No: 0115101A1; Dup or Spiked Sample: B0115101A1; LCS: Blank; QC Prepared: 01/15/2010; QC Analyzed: 01/15/2010; Units: ug/L

Analytes	Sample Result	MS Concen	MS Recov	MS % REC	MS DUP Concen	MS DUP Recov	MS DUP % REC	RPD %	MS/MSD % Limit	MS RPD % Limit
Benzene	0.00	50.0	56.5	113	50.0	52.5	105	7.3	75-125	<20
Chlorobenzene	0.00	50.0	49.6	99.2	50.0	45.1	90.2	9.5	75-125	<20
1,1-Dichloroethene	0.00	50.0	54.0	108	50.0	58.5	117	8.0	75-125	<20
Methyl-tert-butyl ether (MTBE)	0.00	50.0	58.5	117	50.0	58.0	116	<1	75-125	<20
Toluene (Methyl benzene)	0.00	50.0	52.0	104	50.0	46.6	93.2	11.0	75-125	<20
Trichloroethene	0.00	50.0	70.5	141	50.0	59.5	119	16.9	75-125	<20
Surrogates										
Bromofluorobenzene	0.00	50.0	50.0	100	50.0	50.5	101	<1	75-125	<20
Dibromofluoromethane	0.00	50.0	52.0	104	50.0	52.5	105	<1	75-125	<20
Toluene-d8	0.00	50.0	48.2	96.3	50.0	48.6	97.1	<1	75-125	<20

QC Batch No: 0115101A1; Dup or Spiked Sample: B0115101A1; LCS: Blank; QC Prepared: 01/15/2010; QC Analyzed: 01/15/2010; Units: ug/L

Analytes	LCS Concen	LCS Recov	LCS % REC	LCS/LCSD % Limit
Benzene	50.0	53.0	106	75-125
Chlorobenzene	50.0	44.2	88.4	75-125
1,1-Dichloroethene	50.0	58.5	117	75-125
Methyl-tert-butyl ether (MTBE)	50.0	58.0	116	75-125
Toluene (Methyl benzene)	50.0	45.5	91.0	75-125
Trichloroethene	50.0	60.0	120	75-125
LCS				
Chloroform (Trichloromethane)	50.0	55.0	110	75-125
Ethylbenzene	50.0	39.1	78.2	75-125
1,1,1-Trichloroethane	50.0	48.3	96.6	75-125
o-Xylene	50.0	41.7	83.4	75-125
m,p-Xylenes	100	78.2	78.2	75-125
Surrogates				
Bromofluorobenzene	50.0	51.0	102	75-125
Dibromofluoromethane	50.0	52.0	104	75-125
Toluene-d8	50.0	47.9	95.7	75-125

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Data Qualifiers and Descriptors

Data Qualifier:

*:	In the QC section, sample results have been taken directly from the ICP reading. No preparation factor has been applied.
B:	Analyte was present in the Method Blank.
D:	Result is from a diluted analysis.
E:	Result is beyond calibration limits and is estimated.
H:	Analysis was performed over the allowed holding time due to circumstances which were beyond laboratory control.
J:	Analyte was detected . However, the analyte concentration is an estimated value, which is between the Method Detection Limit (MDL) and the Practical Quantitation Limit (PQL).
M:	Matrix spike recovery is outside control limits due to matrix interference. Laboratory Control Sample recovery was acceptable.
MCL:	Maximum Contaminant Level
NS:	No Standard Available
S6:	Surrogate recovery is outside control limits due to matrix interference.
S8:	The analysis of the sample required a dilution such that the surrogate concentration was diluted below the method acceptance criteria.
X:	Results represent LCS and LCSD data.

Definition:

%Limi:	Percent acceptable limits.
%REC:	Percent recovery.
Con.L:	Acceptable Control Limits
Conce:	Added concentration to the sample.
LCS:	Laboratory Control Sample
MDL:	Method Detection Limit is a statistically derived number which is specific for each instrument, each method, and each compound. It indicates a distinctively detectable quantity with 99% probability.

American Environmental Testing Laboratory Inc.
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Data Qualifiers and Descriptors

MS:	Matrix Spike
MS DU:	Matrix Spike Duplicate
ND:	Analyte was not detected in the sample at or above MDL.
PQL:	Practical Quantitation Limit or ML (Minimum Level as per RWQCB) is the minimum concentration that can be quantified with more than 99% confidence. Taking into account all aspects of the entire analytical instrumentation and practice.
Recov:	Recovered concentration in the sample.
RPD:	Relative Percent Difference

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE
RCRA COMPLIANCE EVALUATION INSPECTION REPORT

Purpose:	RCRA Compliance Evaluation Inspection
Facility:	Neutragena
Location:	5760 West 95th Street Los Angeles, CA 90045
Mailing Address:	Same as above
EPA ID Number:	CAR 000 054 031
Date of Inspection:	October 22, 2009
EPA Representatives:	Cameron McDonald Environmental Scientist (415) 972-3308 Jennifer Downey Environmental Protection Specialist (415) 972-3342
Facility Representatives:	Bob Hueso Environmental Health and Safety Manager (310) 216-2465 Millie Chu Environmental Health and Safety Staff Engineer (310) 216-2440 J. Wade Flowers Facilities Team Leader (310) 410-5810
Report Prepared by:	Cameron McDonald
Report Date:	December 4, 2009

Introduction

The purpose of the October 22, 2009 Compliance Evaluation Inspection was to determine Neutragena's ("Neutragena" or "the facility") compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (C.F.R.), Title 40 Parts 261 through 265, 273 and 279; the California Health and Safety Code, Division 20, and the California Code of Regulations (C.C.R.), Title 22, Division 4.5.

EPA was assisted in this inspection by a representative of California's Certified Unified Program Agency (CUPA). The representative was Ms. Mashid Harrell, Hazardous Materials Specialist II from the County of Los Angeles Fire Department's Health Hazardous Materials Division.

The inspectors conducted a physical inspection of the facility and reviewed records related to hazardous waste management practices at the facility. Facility representatives met with the inspectors, accompanied them during the physical inspection of the facility, and provided the records requested during the inspection. An exit briefing summarizing the inspection results was held with the facility representatives.

This inspection report summarizes the events that transpired during the inspection, including observations and findings made by the inspectors.

Facility Background

Facility Name	Neutragena
Recent Facility History	The actual building or facility has been at this location since 1960. The facility was acquired by Johnson & Johnson in 1994.
Filed Notification of Hazardous Waste Activity	The facility submitted the Notification of Regulated Waste Activity in June, 1999. The facility declared hazardous waste generation of D001, D002, D003, D008, F003 and F005.
Number of Employees	900 to 1,000
Hours of Operation	24 hour operation for six days of the week
Size of Facility	55,000 square feet
Facility Processes	This facility manufactures skin and hair care products.
Waste Streams	Flammables, corrosives, used oil, universal waste such as fluorescent lamps and electronic equipment and non-RCRA hazardous waste.
Generator Status	Large Quantity Generator (LQG)
Inspection History	The most recent State or CUPA inspection recorded in the RCRAInfo database was on 10/05/2006.

Preliminaries

Upon entering the facility, the inspectors introduced themselves to Mr. Bob Hueso, the Environmental, Health and Safety Manager, Mr. J. Wade Flowers, the facility Team Leader, and Mr. Raphael Bustes, an Environmental Assistant. The inspectors provided their credentials to Mr. Hueso, Mr. Flowers and Mr. Bustes and explained that the visit was a routine inspection that would consist of a physical inspection of the areas where hazardous waste is potentially

generated and accumulated, a review of records related to hazardous waste activities at the facility, and an exit briefing for the facility representatives.

The inspectors also informed Mr. Hueso, Mr. Flowers and Mr. Bustes of Neutragena's right to claim the privilege of confidential business information during the inspection or after receipt of the inspection report.

The inspectors requested a tour of the facility with a facility representative. Mr. Hueso, Mr. Flowers and Mr. Bustes began to conduct the facility tour. Ms. Jennifer Downey, an EPA Region IX RCRA inspector, took photographs of items within the facility that were pertinent to the RCRA inspection with the facility's consent.

Facility Walkthrough

According to the facility representatives, Neutragena has seven research and development laboratories. The inspectors decided to begin the inspection with the laboratories.

Analytical Laboratory

The inspectors observed a satellite accumulation area (SAA). The SAA consisted of one 3-gallon red polyethylene container holding methanol and acetonitrile and one 5-gallon red polyethylene container holding HPLC vials. The 3-gallon container had secondary containment. Both containers were properly closed and labeled in accordance with federal and California regulations. The inspectors did not observe any potential RCRA violations.

Preparation Laboratory

The inspectors observed a SAA consisting of one 30-gallon blue polyethylene container holding a cosmetic liquid that was determined by the facility to be toxic hazardous waste. The 30-gallon container was properly closed and labeled in accordance with federal and California regulations. The inspectors did not observe any potential RCRA violations.

Production Development Laboratory (Skin Care)

The inspectors observed a SAA holding four containers that were properly closed and labeled in accordance with federal and California regulations. One container held methanol and acetonitrile. The other containers held non-RCRA hazardous waste and solid debris. The inspectors did not observe any potential RCRA violations.

Technical Assurance Tech Transfer Laboratory (TATT)

The inspectors observed two SAAs holding a total of seven containers that were properly closed and labeled in accordance with federal and California regulations. The containers are described in the table below. The inspectors did not observe any potential RCRA violations.

Accumulation Start Date	Container Description	Content Description	Additional Information
10/21/09	25-gallon blue polyethylene	Cosmetic precursor solids, non-RCRA HW	CA toxic
10/20/09	5-gallon blue polyethylene	Cosmetic liquid waste, non-RCRA HW	CA toxic
10/15/09	Red polyethylene can	Solid debris	Flammable
10/05/09	25-gallon blue	Precursor solids, non-RCRA	CA toxic

Accumulation Start Date	Container Description	Content Description	Additional Information
	polyethylene	HW	
09/16/09	5-gallon polyethylene	Precursor liquids, non-RCRA HW	CA 183, toxic
08/20/09	30-gallon blue polyethylene	Cosmetic precursor waste, non-RCRA HW	CA 352
10/15/09	Red polyethylene can	Solid debris	flammable

Product Development Laboratory (Skin Care)

The inspectors observed a SAA holding five containers that were properly closed and labeled in accordance with federal and California regulations. The containers are described in the table below. The inspectors did not observe any potential RCRA violations.

Accumulation Start Date	Container Description	Content Description	Additional Information
10/21/09	55-gallon blue polyethylene	Cosmetic precursor solid, non – RCRA HW	CA toxic
07/02/09	20 gallon blue polyethylene	Spent Neutar, solid debris, non-RCRA HW	CA toxic
10/20/09	5-gallon polyethylene	Cosmetic liquid waste, non-RCRA HW	CA 133, toxic
10/15/09	5-gallon red polyethylene	Spent Neutar	
10/15/09	Red polyethylene can	Solid debris	flammable

Analytical Instrumentation Laboratory

The inspectors observed several SAAs which held a total of five containers holding methanol and acetonitrile and one container holding HPLC vials. The inspectors failed to note a description of the container holding the HPLC vials. All of the containers were properly closed and labeled in accordance with federal and California regulations. The inspectors did not observe any potential RCRA violations.

Pilot Laboratory

The inspectors observed a SAA consisting of one 10-gallon container and one 30-gallon container each holding a non-RCRA waste described as cosmetic precursor solids. Both containers were properly closed and labeled in accordance with federal and California regulations. The inspectors did not observe any potential RCRA violations.

Stability Laboratory

The inspectors observed a SAA consisting of one containers holding methanol and acetonitrile and one 30-gallon container holding a non-RCRA waste described as cosmetic precursor solids. The containers were properly closed and labeled in accordance with federal and California regulations. The inspectors did not observe any potential RCRA violations.

Research and Development 90-day Area

The inspectors next visited the 90-day area for Research and Development. The 90-day area was divided into several compartments. The first compartment held two 250-gallon totes containing mixed caustics. The totes were properly closed and labeled in accordance with federal and California regulations. The second compartment held two 55-gallon polyethylene

containers holding mixed caustics and seven 55-gallon polyethylene containers holding precursor liquids. The inspectors could not read the labels on three of the 55-gallon polyethylene containers holding precursor liquids as there was inadequate aisle space (Photo 1, Attachment 1). The labels that the inspectors could read were completed in accordance with federal and California regulations. All containers appeared properly closed.

The third compartment was labeled "Flammables," and held three 55-gallon polyethylene containers and one 30-gallon metal container. The containers were labeled respectively as "Aerosols," "HPLC Waste," "mixed solvents," and "debris contaminated with solvent." The labels were completed in accordance with federal and California regulations and the containers were properly closed.

Wastewater Pretreatment Area

In this area, the facility conducts pH adjustment and neutralization of rinse waters. The inspectors observed two storage tanks holding cosmetic rinse water, one tank contained 20,000 gallons and the second tank contained 10,000 gallons. The inspectors also observed two 5,000 gallon process tanks, one tank holding sludge from the cosmetic rinse water and the second tank acts as a recirculation tank. The inspectors also observed a 1,200 gallon tank holding "grey water." The inspectors looked at the wastewater system hourly permit inspection log which logged the pH between 7 and 7.5.

90-day Storage Area near Wastewater Treatment Area

The inspectors observed a 4,000-gallon steel tank labeled as "cosmetic rinse water, "Non-RCRA HW" with an accumulation start date of 10/13/09 and a California waste code of 133. California lists 133 waste as "aqueous solution with 10% or more total organic residues". The tank was adequately bermed.

The inspectors were shown two gated and locked compartments. Inside the first gated compartment, the inspectors observed a total of sixteen containers. The majority of the containers were properly closed and labeled in accordance with federal and California regulations (see table below). One 55-gallon container labeled as holding cosmetic rinse water with a California waste number did not have an accumulation start date (Photo 2, Attachment 1). The facility representatives immediately added the accumulation start date of 09/08/09.

# of Containers	Accumulation Start Dates	Container Description	Content Description	Additional Information
5	10/20/09 10/19/09 10/20/09 10/19/09 10/19/09	Cubic yard cardboard boxes	Packaged consumer products	CA 331
1	10/17/09	55-gallon blue polyethylene container	Debris contaminated with solvent	D001
1	09/09/09	Cubic yd cardboard box	Off-spec soap	CA 133
3	10/20/09 10/21/09 10/22/09	Cubic yard cardboard boxes	Precursor solids	CA 352
1	10/06/09	Stainless steel tank	Off spec T-gel shampoo	DA 343, toxic
1	Empty daily	55-gallon metal drum	Cosmetic rinse water	CA 133

# of Containers	Accumulation Start Dates	Container Description	Content Description	Additional Information
1	09/01/09	40-gallon polyethylene	Mixed acids	D002, D007, D011
1	09/10/09		Coal tar liquids	CA 343
2	09/08/09	55-gallon blue polyethylene	Cosmetic rinse water	CA 133

Chemical Warehouse 90-day area

The inspectors observed five 55-gallon blue polyethylene containers holding caustic solids with an EPA Waste Code of D002 in the chemical warehouse 90-day storage area. The containers were closed and labeled in accordance with federal and California regulations.

The inspectors also observed fourteen cubic yard cardboard containers that were identified as holding California-only hazardous waste. The majority of the containers were closed and labeled in accordance with federal and California regulations. One cubic yard container holding precursor solids did not have the year of the accumulation start date (Photo 3, Attachment 1) The containers were labeled as:

- precursor solids with a California waste code of 352 (3 containers),
- packaged chemical products with a California waste code of 331 (10 containers),
- asbestos (1 container, no California waste number), or
- packaged consumer products (1 container, no California waste number).

The inspectors also observed in the chemical warehouse approximately eight SAAs. Four of the SAAs consisted of a red 10-gallon polyethylene container labeled "flammable solid debris" with an EPA waste code number of D001. The other four SAAs consisted of a grey 55-gallon polyethylene container labeled as precursor solids. According to the facility representative, all of the SAAs are emptied daily. The inspectors observed at least one of the "Empty Daily" labels.

Machine Shop 90-day Area

The inspectors were then shown a small locked caged section within the Machine Shop which is operated as a 90-day area. In this area, the inspectors observed one 30-gallon polyethylene container labeled as "oil waste." The inspectors informed the facility personnel that the container should be labeled as "Used Oil." The 30-gallon polyethylene container had secondary containment and latched funnel in the bung hole of the container.

The inspectors also observed three containers labeled, respectively, "oil debris waste," "precursor solids" and "dust collector filters and plastics." According to the facility representative, all of these wastes fall under the California waste code CA 352. California lists 352 wastes as "other organic solids."

The inspectors also observed one 5-gallon metal container labeled as "MEK waste," with an accumulation start date of 10/15/09. The inspectors expressed a concern that the MEK container was not labeled as RCRA waste and did not have the EPA waste code of D035.

The inspectors also observed three containers of universal waste that were labeled appropriately according to federal regulations. Because of the height of the six foot container holding fluorescent lamps, the inspectors could not verify that the container was closed.

71 Accumulation Area (a 90-day Area)

This 90-day area is actually a truck loading area. The facility practice is to fill 40-foot long trailer-truck with cubic yard cardboard containers of potentially California-only hazardous waste that will be transferred to a Treatment, Storage, and Disposal facility (TSDF). According to the facility representative, at the time of the inspection, there were 30 cubic cardboard containers in the trailer. There was no aisle space in the trailer to allow the inspectors to check the containers (Photo 4, Attachment 1). The inspectors could only see the labels on four of the containers. Three of the four cubic cardboard container labels that were visible identified the contents as "packaged consumer products with a California waste code of 331. The fourth label did not have an accumulation start date (Photo 5, Attachment 1). The inspectors advised the facility representatives that this procedure for storing California-only hazardous waste does not follow California regulations regarding 90-day areas. The regulations [22 CCR § 66262.34(f)(1)] state that California-only hazardous waste containers must be staged such that the date upon which each period of accumulation begins shall be clearly marked and visible for inspection on each container.

Production Areas

According to the facility representatives, the production area has about 40 to 50 "lines" and two to three SAAs per line. The walkthrough showed the inspectors that there are approximately five general areas of production identified as the "Filler Room, "High Volume Area," "Bottles," "Tube Area," and "Soap." The inspectors observed four to eleven SAA containers per production area. The containers were either a grey 55-gallon polyethylene container labeled as "production solids" or a red 5-gallon polyethylene container labeled as "rinson/para acetic acid use 1-5%" with an EPA waste code of D001. All of the containers were labeled "Emptied Daily." The inspectors observed a total of thirteen grey 55-gallon polyethylene containers and a total of seventeen red 5-gallon polyethylene containers. The inspectors did not observe any potential RCRA violations in the production areas.

Record Review

Under the assumption that this facility is a Large Quantity Generator (LQG), the inspectors requested to review manifests from the years 2007 through and including 2009. The manifests confirmed that the amount of hazardous waste generated per month placed the facility into the LQG category. There were no manifest discrepancies and Land Disposal Restriction Notifications (LDRs) were available.

The inspectors requested to review the additional records that a LQG facility is mandated by both federal and California regulations to maintain.

The records reviewed included the contingency plan which included the information needed for preparedness and prevention and the necessary phone numbers for the emergency coordinators and an emergency equipment list with descriptions and locations. The inspectors also reviewed the weekly inspection logs, and the 2007 Biennial Report.

The inspectors also viewed the facility's training plan and training records. The training plan is adequate and the training records demonstrate basic hazardous awareness training.

During the debrief meeting, the inspectors requested to view copies of the Material Safety Data Sheets (MSDS) for some of the waste identified as California only hazardous waste

with the California waste codes 133 and 122. California waste code 133 is described as aqueous solution with 10% or more total organic residues.

The MSDS for the waste identified as cosmetic liquid waste or precursor liquids with the California waste code 133 stated that the waste had a volatile organic concentration (VOC) ppm greater than 500. The inspectors expressed a concern as a VOC concentration over 500 ppm indicates that the waste may be regulated federally and subject to 40 C.F.R. § 265 Subpart BB, Air Emission Standards for Tanks, Surface Impoundments, and Containers.

Subsequent to the Inspection

On October 28, 2009, EPA received via electronic mail a letter which itemized Neutragena's corrections of the observed potential violations. In this packet, Neutragena included a revised profile of the cosmetic precursor liquids. The profile was created by All Chemical Disposal, Inc. The profile identified the cosmetic precursor liquids as a non-RCRA hazardous waste and assigned the California waste code number 343. California describes 343 as unspecified organic liquid mixture.

POTENTIAL VIOLATIONS

Used Oil

22 C.C.R. § 66279.21(b)
40 C.F.R. § 279.22(c) Labels (1) Containers and aboveground tanks used to store used oil at generator facilities must be labeled or marked clearly with the words "Used Oil."

Finding: The inspectors observed a 30-gallon polyethylene container labeled "oil waste."

Facility Response: On October 28, 2009, EPA received via electronic mail written assurances that used oil containers now are appropriately labeled as "Used Oil." The letter also stated that Neutragena will increase the facility's hazardous waste storage inspection frequency and increase supervision of Neutragena's waste management contractors.

CALIFORNIA-ONLY POTENTIAL VIOLATIONS

Accumulation Time

22 C.C.R. § 66262.34(a)(2) A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that: (2)The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

Finding: The inspectors observed three non-RCRA hazardous waste containers that did not have accumulation start dates. The first container was a 55-gallon container holding cosmetic rinse water precursor and staged in the research and development 90-day area, the second container was a cubic yard container holding precursor solids staged in the Chemical Warehouse 90-day area and the third container was a cubic yard container holding packaged consumer products.

Facility Response: The facility representatives immediately added the accumulation start date of 09/08/09 onto the 55-gallon container staged in the research and development 90-day area. On October 28, 2009, EPA received via electronic mail written assurances that all hazardous waste and non-RCRA hazardous waste containers now have accumulation start dates. The letter also stated that Neutragena will increase the facility's hazardous waste storage inspection frequency and increase supervision of Neutragena's waste management contractors.

90-day area

22 C.C.R. § 66262.34 — A generator may accumulate hazardous waste on-site for 90 days or less without a permit or without having interim status, provided that: (2)The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container.

AND

22 C.C R. § 66265.35 — The owner or operator must maintain aisle space to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of the facility operation in an emergency, unless aisle space is not needed for any of these purposes.

Finding: The inspectors observed in the research and development 90-day area seven 55-gallon polyethylene containers of which the inspectors could not read the accumulation start dates on three of the containers due to inadequate aisle space. The inspectors also observed in the 71 Accumulation Area which is also a 90-day area, approximately 30 cubic yard containers stored in a trailer truck. The 30 containers were staged such that the inspectors could not see the accumulation start dates.

Facility Response: On October 28, 2009, EPA received via electronic mail written assurances that all hazardous waste and non-RCRA hazardous waste containers are now staged to insure adequate aisle space. The letter also stated that Neutragena will increase the facility's hazardous waste storage inspection frequency and increase supervision of Neutragena's waste management contractors. The facility also sent a photograph of the research and development 90-day area on November 23, 2009 that demonstrated that the containers are now staged with adequate aisle space.

ATTACHMENT 1

PHOTOGRAPH LOG

Compliance Evaluation Inspection Field Photograph Log
Neutragena, Los Angeles, California

Photo 1 – Blue polyethylene 55-gallon containers in Research and Development 90-day area. The inspectors cannot see all of the hazardous waste labels because of how the containers are staged

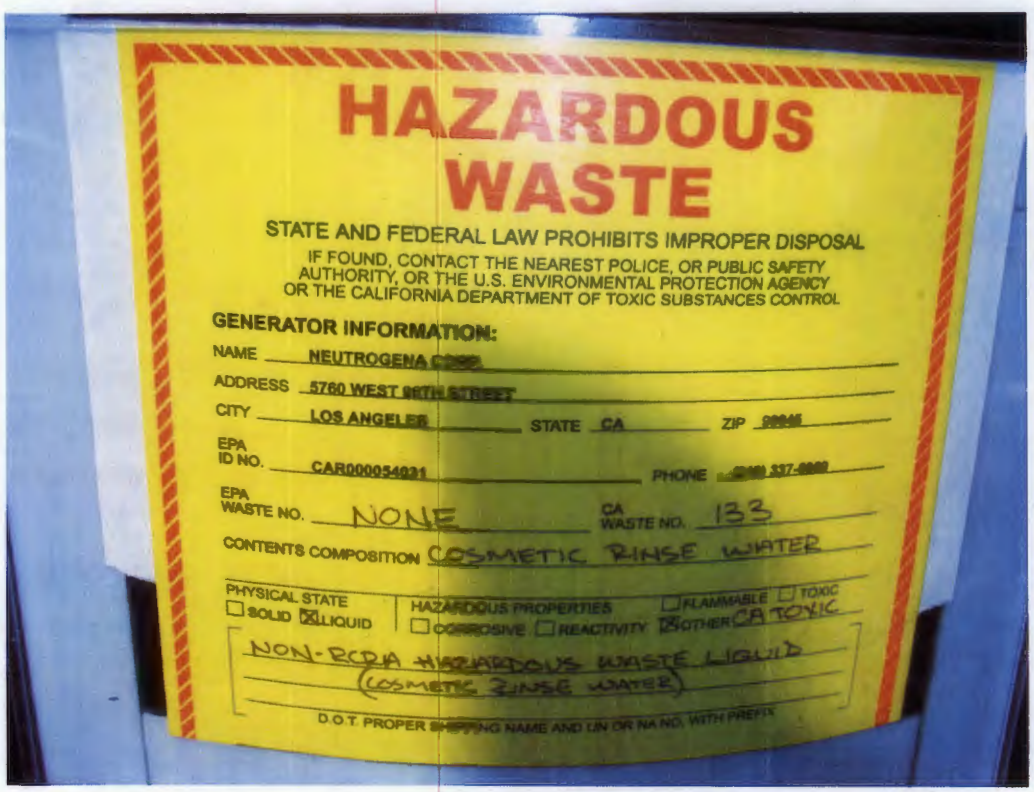

Photo 2 – California-only hazardous waste label missing an accumulation start date.

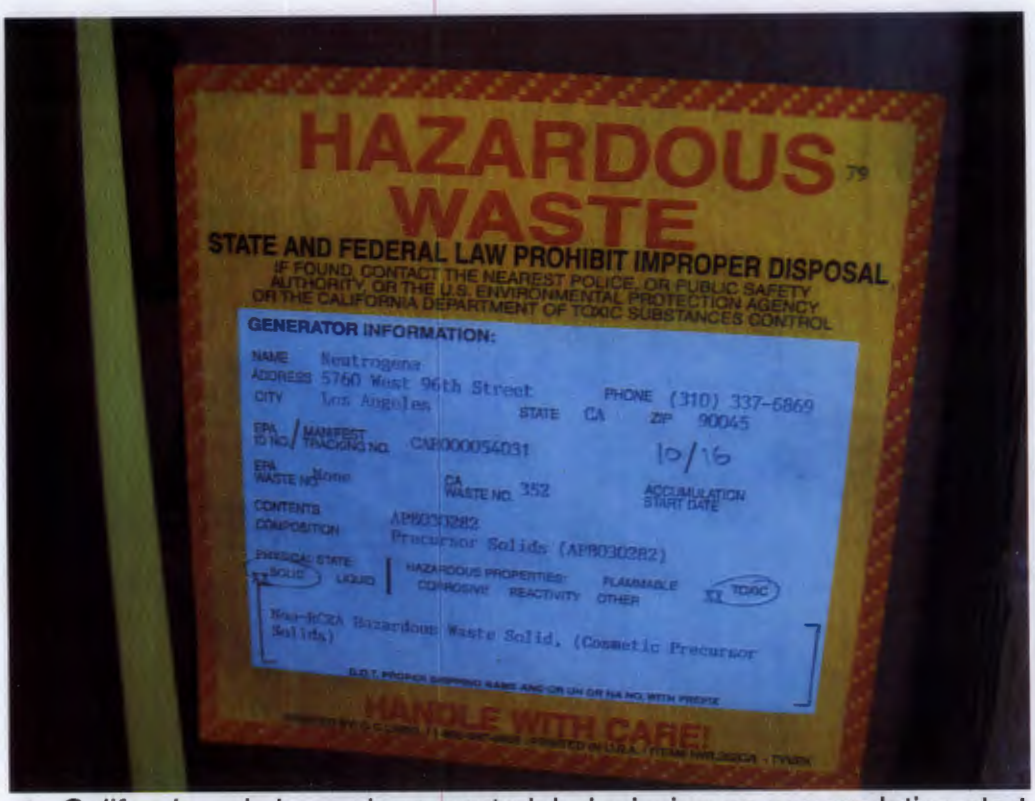

Photo 3 - California-only hazardous waste label missing an accumulation start date.

Photo 4 – Five of supposed 30 containers being stored in a 40-foot trailer prior to shipment to a TSDF.

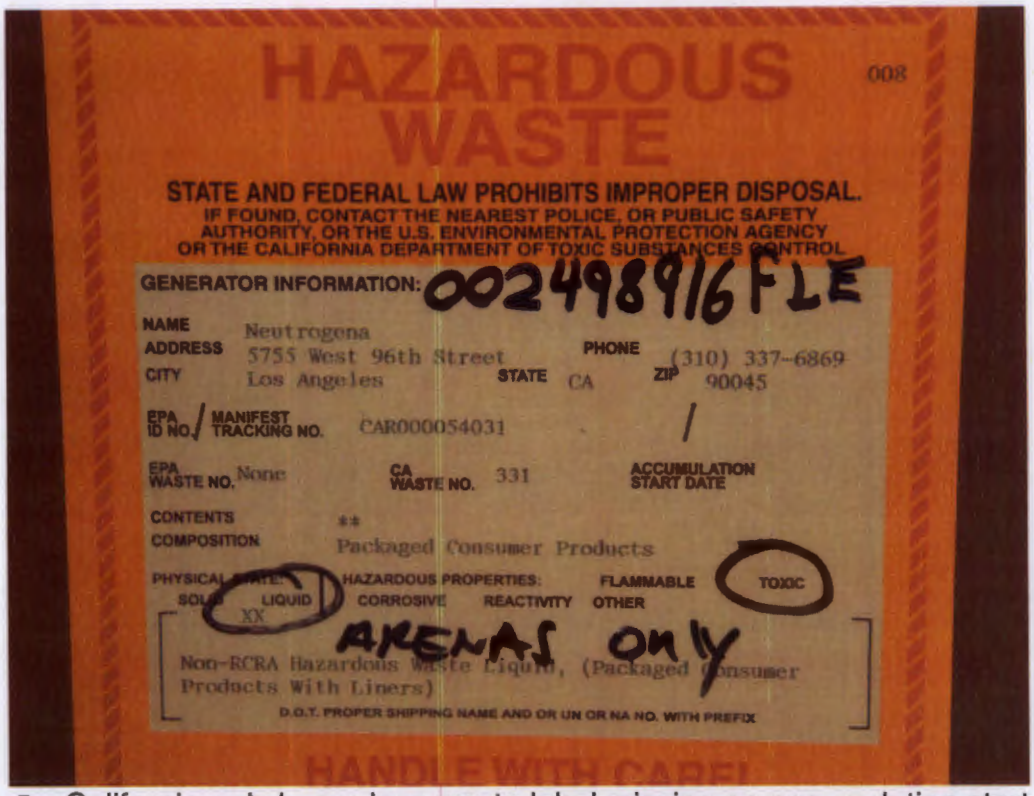

Photo 5 – California-only hazardous waste label missing an accumulation start date.

Neutrogena
CORPORATION

5760 West 96th Street
Los Angeles, CA 90045
310.642.1150

October 28, 2009

Ms. Cameron McDonald
RCRA Enforcement Officer
Waste Management Division
75 Hawthorne Street, WST-3
San Francisco, CA 94105

Subject
Corrective actions for issues found during inspection on Thursday, 10/22/2009

Dear Ms. McDonald:

Neutrogena Corporation is submitting this corrective action plan for your review.

Finding #1:
Two hazardous waste containers had faded labels.

Corrective action –

1. Hazardous waste labels were corrected during the inspection.
2. All hazardous waste containers were inspected within 24 hours to ensure compliance.
3. Purchase plastic sleeves to protect labels for hazardous waste containers.
4. Increase frequency of inspection for all hazardous waste storage areas.
5. Increase supervision from Neutrogena to ensure waste management contractors comply with regulations.
6. Waste management contractors were re-trained to ensure compliance with regulation.

Finding #2:
One hazardous waste label had no accumulation start date.

Corrective action –

1. Hazardous waste label was corrected during the inspection.
2. All hazardous waste containers were inspected within 24 hours to ensure compliance.
3. Increase frequency of inspection for all hazardous waste storage areas.
4. Increase supervision from Neutrogena to ensure waste management contractors comply with regulations.

5. Waste management contractors were re-trained to ensure compliance with regulation.

Finding #3:
One "used oil" waste container was incorrectly labeled "waste oil".

Corrective action –

1. Label was corrected within 24 hours.
2. All "used oil" containers were inspected to ensure compliance.
3. Waste management contractors were re-trained to ensure compliance with regulation.

Finding #4:
Storage of hazardous waste in trailers had no aisle space for inspection.

Corrective action –

1. Hazardous waste containers in trailer were re-arranged to ensure ample aisle space for inspection.
2. Waste management contractors were re-trained on proper storage requirement.
3. Best management practice is added to the work instruction to ensure compliance with regulation.
4. Increase supervision from Neutrogena to ensure waste management contractors comply with regulations.

Finding #5:
Waste profile # AP8030281_314, CA waste code #343 indicated VOC content >= 500 ppm.

Corrective action –

1. Original waste profile from Safety Kleen showed VOC >= 500 ppm. Please see attached document for more information. We feel when Clean Harbor acquired the company, they checked the wrong box.
2. Within 45 days, Clean Harbor will review all of Neutrogena's waste profiles to ensure accuracy.
3. Neutrogena will set-up an annual review of waste profiles to ensure accuracy.

If you have any questions, please contact me at (310) 216 – 2465 or via email at rhueso@its.jnj.com

Sincerely,

Bob Hueso
EH&S Manager
Neutrogena

Neutrogena
CORPORATION

5760 West 96th Street
Los Angeles, CA 90045
310.642.1150

December 21, 2009

Ms. Amy C. Miller
Mail code: WST-3
RCRA Enforcement Office
Waste Management Division
75 Hawthorne Street
San Francisco, CA 94105

Dear Ms. Miller,

Neutrogena has received your letter, sent on December 8, 2009. You have requested a waste determination of the waste generated by our facility that is identified as cosmetic liquid waste and precursor liquids. Neutrogena is informing you in this letter that we accept your request.

However, Neutrogena operation is shut down for semi-annual maintenance. This creates a delay to data collection and sampling analysis. We will make every effort to respond to your request in a prompt manner.

If you have any questions, please contact me at (310) 216 – 2465 or via email at rhueso@its.jnj.com

Sincerely,

Bob Hueso
Environmental Health and Safety Manager
Neutrogena

CC. Cameron McDonald, RCRA Enforcement Officer

SK REFERENCE NO: AP 8030281

safety-kleen.

MATERIAL PROFILE

Safety-Kleen (SK) Use Only	If applicable, Intercompany Billing Facility #	Customer Number:	SK Line Of Business #:	Facility Profile #:

A. GENERATOR INFORMATION

☐ Check if Billing Information is same as Generator Information

Generator Name: Neutrogena

Facility Address (No P.O. Box): 5760 W 96th Street

City/State/Zip: Los Angeles, CA 90045

Technical Contact: Albino Zegarra

Phone: 213/923-2594 Fax: 562/493-2456

Billing Company: All Chemical Disposal, Inc

Billing Add: 21 Great Oaks Blvd

San Jose, CA 95119

City/State/Z: Contact: Mark Navartil

Billing Cor: Ph: 408/363-1660

Phone 2: Fax: 408/363-3589

Generator Location (If different from Facility Address): same

SIC Code: ☐ CESQG ☒ SQG US EPA ID #: CAR000054031 State Generating ID #: HAEF36018013

B. SHIPPING INFORMATION

☐ DOT Assistance Requested ☐ Check if SK Transportation Services are requested

US DOT Proper Shipping Name: Non-RCRA Hazardous Waste Liquid

Hazard Class / Division #: NA ID # (UN / NA): NA Packing Group (PG): N RQ:

Non-Bulk Shipping Containers

Size	Steel	Poly	Fiber	Quantity & Frequency
55 Gal	☐	☒	☐	monthly
___ Gal	☐	☐	☐	
___ Gal	☐	☐	☐	
___ Gal	☐	☐	☐	

Bulk Shipping Containers

Container Type	Quantity, Size & Frequency
☐ Yd.³ Box or ☐ Super Sack	
☐ Hard Top or ☐ Tarped Bin	
☐ End Dump (Tarped) Trailer	
☐ Tank or ☐ Vacuum	

C. GENERAL MATERIAL & REGULATORY INFORMATION

Name of Material: Cosmetic precursor liquids

Process Generating The Material: facility clean out

Odor: ☐ None ☒ Mild ☐ Strong;

Yes	No		Yes	No	
☐	☒	Regulated or Licensed Radioactive Waste	☐	☒	Meets LDR Standards or ☐ Partially Meets (Landfill Only)
☐	☒	Regulated Medical / Infectious Waste	☐	☒	Commingled Waste (2 or more hazardous wastes mixed as one)
☐	☒	Regulated Benzene NESHAP Waste	☐	☒	Sorbent Added; If Yes, is sorbent biodegradable? ☐ Yes ☐
☐	☒	TSCA Regulated PCB Waste (List any PCB level in Sec.D)	☐	☒	Exempt Waste; If Yes, list reference, 40 CFR
☐	☒	Regulated Subpart CC Waste (VOs = 500 ppm)	☒	☐	State Hazardous Waste; State Code 343
☐	☒	Regulated Ozone Depleting Substance	☐	☒	EPA Hazardous Waste
☐	☒	CERCLA Regulated (Superfund) Waste			EPA Waste Codes (including any LDR subcategories, e.g., D003 Water Reactive):
☐	☒	Hazardous Debris (Subject to alternative LDR treatment standards)			
☐	☒	Waste Contains UHCs/Constituents Of Concern			
		If Yes, list in ☐ Sec. D or ☐ Constituent Addendum			

EPA Haz Waste Only Origin Code: ☐ 1 ☐ 2 ☐ 3 ☐ 4 ☐ Source Code: A ___ Form Code: B ___ System Code: M ___

D. MATERIAL COMPOSITION

1. **Chemical/Physical Constituents:** List all detectable components by chemical name, including physical material, e.g., sorbent, debris.

Material Components & Composition	ppm	☐ wt % ☒ vol %	Material Components & Composition	ppm	☐ wt % ☐ vol %
glycerines, olefins, oils, dyes, silicones in glass containers < 1 pint size		100			

Section D continues on the next page for Elemental Constituents * Range Total = 100 %

SAFETY-KLEEN MATERIAL PROFILE (continued):

SK REFERENCE NO: AP 8030281

Note: Completion of Sections D.2 & F is optional for: ☐ Analytical Profile (representative sample submitted; test results used to complete D.2 & F)
Completion of Sections D.2, E, & F is optional for: ☐ Standard Industry Profile (Safety-Kleen historical data utilized to complete D.2, E, & F)

D. MATERIAL COMPOSITION *(Continued)*

2. Elemental Constituents ☒ *Check if this waste contains No Detectable Elements / Metals, unless listed below.*

Check either; ☐ Total Analysis *or* ☐ TCLP Method *or* ☒ Generator Knowledge, then enter data below.

Constituent	ppm	Constituent	ppm	Constituent	ppm	Constituent	ppm	Constituent	ppm
Aluminum		Cadmium		Fluorine		Nickel		Sodium	
Antimony		Chlorine		Lead		Phosphorous		Sulfur	
Arsenic		Chromium		Lithium		Potassium		Thallium	
Barium		Cobalt		Manganese		Selenium		Titanium	
Beryllium		Copper		Mercury		Silicon		Vanadium	
Bromine		Iodine		Molybdenum		Silver		Zinc	

E. REACTIVE CHARACTERISTICS

☐ *Check if this waste exhibits No Reactive Characteristics*

Yes	No		Yes	No		Yes	No		
☐		Explosive	☐	☒	Oxidizer	☐		Reactive Cyanide	ppm
☐		Shock Sensitive	☐	☒	Water Reactive	☐		Reactive Sulfide	ppm
☐		Pyrophoric	☐	☒	Air Reactive	☐		Polymerizable	

Other Incompatibles; Describe

F. MATERIAL PHYSICAL CHARACTERISTICS @ 70°F.

# of Phases	1	Color	varies	Flash Point	°F (if < 73°F)	pH ☐ Liquids >20% H_2O *or* pH ☐ Non-Aqueous	
Liquid %	100	Specific Gravity	NA	☐ 73 - <100°F	☐ 100 - 141°F	☐ = 2 pH	☐ > 2 - 4 pH ☒ > 4 - 10 pH
Sludge %		Viscosity cps	NA	☐ 142°F. - <200°F	☒ ≥200°F	☐ > 10 - < 12.5 pH	☐ ≥ 12.5 pH
Solid %		Density		Boiling Point (if < 130°F)	NA	BTU's / lb. or Range	
Powder %		☒ lbs./ gal. ☐ lbs./ cu. ft.		Ash % (Bridgeport Only)	NA		
Gas %		Comments					

G. GENERATOR PROFILE CERTIFICATION

I hereby certify that I am an authorized agent of the generator, and warrant on behalf of the generator that the information supplied on this form and on any attachments or supplements hereto is complete and accurate, and that all known or suspected hazards of the material(s) described herein have been disclosed. I agree that if the sample test results indicate a discrepancy with any information supplied on this form, that either Safety-Kleen or the generator may initiate further testing and evaluation in accordance with the terms and conditions of the contract between Safety-Kleen and the generator, and that this profile certification may be amended accordingly.

Vanessa Clark | *Vanessa Clark for Neutrogena Corp* | 6 / 13 / 01

Generator's Authorized Signature | Name & Title (Printed or Typed) | Date

Comments

SK Use Only ☐ SKOS ☐ SKVS ☐ Non-haz Evaluation ☐ Standard Industry Profile: SIP Index #

SK Sales Rep. Name | Employee # | Territory/Branch #

Process Approval # | Product Code or Part # | TRI Flowpath # | Pricing

Waste Approval & Certification

We certify acceptability of this waste stream and that all appropriate permits have been obtained, as indicated by Safety-Kleen's facility approval

Safety-Kleen's Authorized Facility | Name & Title (Printed or Typed) | Date